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April 9, 2025

VIA ECF

The Honorable Dale E. Ho
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Application to Unseal Materials in *United States v. Adams*, No. 24-CR-556 (DEH)

Dear Judge Ho:

We represent NYP Holdings, Inc., the publisher of the *New York Post*. We write to join in The New York Times Company's letter-motion (ECF No. 133) and supplemental letter (ECF No. 178) requesting the public release of certain materials related to searches executed by the Government in connection with this action (the "Materials").

For the reasons explained in The New York Times Company's letters, the constitutional and common-law rights of access demand that the Materials be made available to the public and the press. As this Court has explained, this case "is a matter of enormous public interest," and there is an extremely strong public interest here in "the manner in which criminal cases are conducted," particularly where various officials have raised "allegations of prosecutorial misconduct" around both the inception and dismissal of this case. ECF No. 174 at 4–5 (citation omitted). Unsealing the Materials will vindicate the extraordinary public interest in the prosecutorial decisions here and "provid[e] a measure of transparency, which in turn may promote public accountability." ECF No. 177 at 77.

We thank the Court for its attention to this matter.

Respectfully submitted,

Davis Wright Tremaine LLP

By: _____

A handwritten signature in blue ink, appearing to read 'Robert D. Balin', written over a horizontal line.

Robert D. Balin
Jeremy Chase
Raphael Holoszyk-Pimentel